

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF VIRGINIA
LYNCHBURG DIVISION

CLERK'S OFFICE U.S. DIST. COURT
AT ROANOKE, VA
FILED

MAR 23 2009

JOHN J. CONNORAN, CLERK
BY: *[Signature]*
DEPUTY CLERK

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

VS.

Criminal Number []

KAREN PRISCILLA JONES

70900198

I, the undersigned complainant, being duly sworn, state the following is true and correct to the best of my knowledge and belief.

Between on or about 12/15/06 and 1/11/08, in the Western District of Virginia, **KAREN PRISCILLA JONES** did knowingly, with intent to defraud, devise a scheme to obtain money or property, in which a communication was sent via wire, radio, or television communication in interstate commerce for the purpose of executing such scheme in violation of Title 18, United States Code, Section 1343.

Furthermore, **KAREN PRISCILLA JONES** did knowingly transfer, possess, or use, without lawful authority, a means of identification of another person in violation of Title 18, United States Code, Section 1028A.

Furthermore, **KAREN PRISCILLA JONES** did knowingly, with intent to defraud, pass, utter, or publish, any Treasury check or bond or security of the United States bearing a falsely made or forged endorsement or signature in violation of Title 18, United States Code, Section 510(a)(2).

I further state that I am a Special Agent, United States Secret Service, and that this complaint is based on the following facts:

See attached affidavit.

Continued on the attached sheet and made a part hereof: ☒ Yes ☐ No

[Signature]
SA B. Douglas McIntosh

Sworn to and subscribed in my presence on March 23, 2009, at Roanoke, Virginia.

Michael F. Urbanski
United States Magistrate Judge

[Signature]
Signature of Judicial Officer

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A F F I D A V I T

I, B. Douglas McIntosh, being duly sworn, depose and state as follows:

1. I have been employed as a Special Agent with the United States Secret Service for approximately seven years. I am currently a Special Agent assigned to the Roanoke Resident Agency in Roanoke, VA, where I have been assigned since August 2007. My investigative duties focus primarily on conducting criminal investigations involving credit card fraud, identity theft, bank fraud, as well as counterfeit currency and other obligations. I have participated in the execution of numerous arrest and search warrants.

2. This Affidavit is made in support of an application for an arrest warrant for violation of Title 18, United States Code, Section 1343 where the defendant did knowingly, with intent to defraud, devise a scheme to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce, any writings, signs, signals, pictures, or sounds for the purpose of executing such scheme; Section 1028A during and in relation to a violation of Section 1343, where the defendant knowingly transfers, possesses, or uses, without lawful authority, a means of identification of another person; Section 510(a)(2) where the defendant did knowingly, with intent to defraud, pass, utter, or publish, any Treasury check or bond or security of the

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United States bearing a falsely made or forged endorsement or signature.

3. On 06/10/08, Victim 1, a resident of Assisted Living Facility 1, Lynchburg, VA, reported to the Lynchburg, VA Police Department that someone had applied for credit cards using her personal information. Victim 1 had received mail from Capital One stating that an account had been opened in her name. Victim 1 never applied for a Capital One account and never authorized anyone to open an account using her personal information. Numerous purchases were made with this account in the Western District of Virginia and each purchase involved an interstate communication to Capital One's servers located in Georgia. Victim 1's correct social security number and date of birth were used to open this account. The address on the account was 3311 Memorial Ave, Lynchburg, VA. This address is a previous address of Karen Priscilla Jones. Karen Priscilla Jones was employed at Assisted Living Facility 1 during the time of the fraudulent activity and had access to Victim 1's room.

4. On 09/26/08, Victim 2, a resident of Assisted Living Facility 2, Lynchburg, VA, reported the theft of her government stimulus check to the Lynchburg, VA Police Department. This check, US Treasury check # 230942836694, in the amount of \$300, was never received by Victim 2. However, this check was cashed on 09/05/08 at a convenience store located in Lynchburg, VA. Victim 2's signature was forged on the endorsement line on the back of the check and a social security number was written underneath that did not belong to Victim 2. The convenience store required the payee to place a thumb print on

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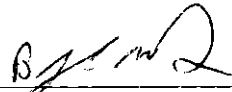
the face of the check at the time it was cashed. The original check was later retrieved from the Department of Treasury and examined. The thumb print placed on the check was a match for the right thumb of Karen Priscilla Jones. Karen Priscilla Jones was employed by Assisted Living Facility 2 when the check was stolen and cashed.

5. On 11/05/08, a local search warrant was executed at 4 Beverly St, Lynchburg, VA, the residence of Karen Priscilla Jones. During this search warrant, numerous credit card statements, mailings, and other personal information belonging to residents of Assisted Living Facilities where Karen Priscilla Jones was previously employed were discovered. These items include account statements, bills, and general mailings in the name of Victim 1 as well as nine (9) other confirmed victims. All of these accounts were determined to be opened without the consent of these victims. Also located in Karen Priscilla Jones' residence was a small notepad containing handwritten notes containing names, dates of births, and social security numbers of other residents of assisted living facilities where she was previously employed.

6. In total, fifteen (15) victims have been discovered and twenty-two (22) accounts have been fraudulently opened or used by Karen Priscilla Jones.

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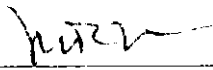
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B. Douglas McIntosh
Special Agent
US Secret Service

Subscribed and sworn

before me this 23rd of March , 2009



Michael F. Urbanski
United States Magistrate Judge